

UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK

In re	:	Chapter 11
	:	
DELPHI CORPORATION, <u>et al.</u> ,	:	CASE NO. 05-44481 (RDD)
	:	
Debtors.	:	(Jointly Administered)
	:	
	:	CLAIM #9956

EXHIBIT SUMMARY RE:
CLAIMANT JOSEPH RENO'S RESPONSE TO
DEBTORS' OBJECTION TO CLAIM #9956

In accordance with the Bankruptcy Court's request (made due to the large number of exhibits attached to Claimant Joseph Reno's Response to the Debtors' Objection to Claim #9956) a summary of said exhibits is hereby provided. Also, any interested party may obtain a copy of these exhibits by contacting the attorney's office designated below.

Exhibit Summary

Exhibit #1 . . . Amended Complaint filed in Case No. 3-04-CV-0321, U.S. District Court, Southern District of Ohio. This Amended Complaint has seven (7) Counts: COBRA Violation, ERISA Violation, Whistleblower Violation, Discharge in Violation of Public Policy, Wage Payment Violation, Defamation, and Fair Credit Reporting Act Violation.

Exhibit #2 . . . Expert Report of SEA's Senior Industrial Hygenist/Senior Project Chemist Ronald N. Thaman, MS, CSP. This expert's report evidences a leak of hazardous waste at Delphi's plant in Kettering, Ohio, and (following Claimant Joseph Reno's discharge from employment) Delphi's failure to comply with OSHA's Process Safety Standard, Hazardous Waste Operations and Emergency Response Regulations, and CERCLA.

Exhibit #3 . . . Delphi Attorney's letter to OSHA dated March 30, 2004, which inter alia claims

that Claimant Reno's discharge from Delphi employment was triggered by the completion of a "misconduct" investigation by its Investigator Brown.

Exhibit #4 . . . Deposition Transcript of Investigator Brown which inter alia directly contradicts the statement made by Delphi's Attorney to OSHA in Exhibit #3 above.

Exhibit #5 . . . Deposition Transcript of material witness Troy Calton which inter alia further evidences that the "misconduct" investigation was a pretext and that the real reason for Claimant Reno's discharge from Delphi employment was: "Joe Reno wanted to do-fix the whole [leaking hazardous waste] tank and Mark Gooding [Delphi Supervisor] wanted to fix just part of it."

Exhibit #6 . . . "Whistleblower" letter by Claimant Reno dated March 2, 2004 . . . fifteen (15) days prior to Delphi's termination of Reno's employment.

Exhibit #7 . . . Expert Report and Economic Analysis of Ralph Frasca, PhD. This expert's report evidences Claimant Reno's lost compensation claim totaling \$1,580,074.

Exhibit #8 . . . Detailed Attorney's Fees Statement for Claimant Reno totaling \$64,356.40.

Respectfully submitted,

s/Brad A. Chalker
Law Offices of Brad A. Chalker LLC
Attorney for Joseph Reno
P.O. Box 750726
Dayton, OH 45475